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Attorneys for Plaintiff



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SHIRLEY JANE LEUNG,
Plaintiff,

v.

FEDERAL DEPOSIT INSURANCE
CORPORATION, SILICON VALLEY BANK,
SVB INVESTMENT SERVICES, INC., SVB
WEALTH, LLC, FIRST-CITIZENS BANK &
TRUST CO., GREG BECKER, JOHN
LONGLEY,

Defendants.

CASE NO. 5:24-CV-00337

**STIPULATION TO EXTEND TIME FOR
PLAINTIFF AND DEFENDANTS GREG
BECKER AND JOHN LONGLEY TO
EXCHANGE DOCUMENTS AND
INFORMATION PURSUANT TO
GENERAL ORDER 71**

1 /Plaintiff Shirley Jane Leung (“Plaintiff”) and Defendants Greg Becker and John Longley
2 (collectively referred to as the “Parties”) through their respective counsel hereby stipulate as
3 follows:
4

5 WHEREAS, Defendant Longley filed his Motion to Dismiss Plaintiff’s Complaint on
6 April 30, 2024, Plaintiff filed her opposition on May 21, 2024, and Defendant filed his reply on
7 May 28, 2024;

8 WHEREAS, under this Court’s General Order No. 71, Defendant Longley and the
9 Plaintiff were scheduled to provide the documents and information described in General Order
10 71 by May 30, 2024;

11
12 WHEREAS, Defendant Becker filed his Motion to Dismiss Plaintiff’s Complaint on May
13 6, 2024, Plaintiff filed her opposition on May 20, 2024, and Defendant filed his reply on May 28,
14 2024;

15 WHEREAS, under this Court’s General Order No. 71, Defendant Becker and the Plaintiff
16 were scheduled to provide the documents and information described General Order 71 by June 5,
17 2024;

18
19 WHEREAS Defendants First Citizen Bank and FDIC-Receiver are working together to
20 identify documents responsive to the Initial Discovery Protocols;

21 WHEREAS Plaintiff and Defendants First Citizen Bank, FDIC-Receiver, Silicon Valley
22 Bank, SVB Investment Services, Inc., SVB Wealth, LLC, and First Citizens Bank & Trust
23 Company stipulated to extend these parties’ deadline to exchange information under General
24 Order 71 to July 8, 2024 [Dkt. 57] and the Court entered this stipulation [Dkt. 58];

25
26 WHEREAS the parties consulted with one another and counsel for Plaintiff and
27 Defendants Becker and Longley jointly agree that an extension of the deadline to exchanging
28

1 materials from the end of May to July 8, 2024, when the other parties are exchanging materials,
2 is most efficient under the circumstances.

3 NOW THEREFORE, IT IS HEREBY STIPULATED by and between the Plaintiff and
4 Defendants Becker and Longley through their respective attorneys that they shall provide the
5 documents and information described in the Court's Initial Discovery Protocols by July 8, 2024.
6

7 Dated: May 29, 2024

MEHRI & SKALET, PLLC

8 /s/ Ellen Eardley
9 Ellen Eardley
10 *Counsel for Jane Leung*

11 GORDON REES
12 SCULLY MANSUKHANI LLP

13 /s/ Seth Weisburst
14 Seth Weisburst
15 *Counsel for Greg Becker*

16 FREEMAN MATHIS & GARY, LLP

17 /s/ Charles Schumake
18 Charles Schumake
19 *Counsel for John Longley*

20 **SIGNATURE ATTESTATION**

21 I hereby attest that I have obtained the consent of Seth Weisburst, counsel for Defendant
22 Greg Becker, and Charles Schumake, counsel for Defendant John Longley for the filing of this
23 stipulation.
24

25
26 /s/ Ellen Eardley
27 Ellen Eardley
28